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Attorneys for Defendant  
ELITE CREATORS LLC

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

N.Z., R.M., B.L., S.M., and A.L.,  
individually and on behalf of themselves  
and all others similarly situated,

Plaintiffs,

v.

FENIX INTERNATIONAL LIMITED,  
FENIX INTERNET LLC, BOSS  
BADDIES LLC, MOXY  
MANAGEMENT, UNRULY AGENCY  
LLC (also d/b/a DYSRPT AGENCY),  
BEHAVE AGENCY LLC, A.S.H.  
AGENCY, CONTENT X, INC., VERGE  
AGENCY, INC., AND ELITE  
CREATORS LLC,

Defendants.

Case No. 8:24-cv-01655-FWS-SSC

**DEFENDANT ELITE CREATORS,  
LLC'S NOTICE OF MOTION  
AND MOTION TO DISMISS**

Date: January 30, 2025

Time: 10:00 a.m.

Crtrm: 10D

Judge: Hon. Fred W. Slaughter

Complaint Served: 8/05/2024

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1 **TO THE COURT, DEFENDANT, AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that on January 30, 2025, at 10:00 a.m., or as soon  
3 thereafter as the matter may be heard in Courtroom 10D of the above-entitled Court,  
4 located at Ronald Reagan Federal Building and U.S. Courthouse, 411 West 4th  
5 Street, Room 1053, Santa Ana, California 92701-4516, Defendant Elite Creators  
6 LLC (“Creators Inc.” or “Defendant”), through its counsel, will and hereby does  
7 respectfully move this Court pursuant to Fed. R. Civ. P. 12(b)(6) for an order  
8 dismissing Plaintiffs’ Complaint in its entirety for failure to state a claim upon which  
9 relief can be granted.

10 Pursuant to L.R. 7-3, this motion is made following the conference of counsel,  
11 which took place on October 18, 2024 via teleconference.

12 This Motion is based on this Notice, and the accompanying Memorandum of  
13 Points and Authorities, the pleadings and papers on file in this action, and such other  
14 matters as the Court may take judicial notice or consider relevant.

15  
16 Dated: October 25, 2024

Respectfully submitted,

DENTONS US LLP

18 By: /s/ Michael Gehret

19 Michael Gehret  
20 Bety Javidzad  
21 Trinity Jordan  
Jordan Westgate  
Samantha Fahr  
Pooja L. Shah

22 Attorneys for Defendant  
23 ELITE CREATORS, LLC  
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